

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

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UNITED STATES OF AMERICA

INDICTMENT

v.

Case No. 15 - CR - 144 - JDP

18 U.S.C. § 641

18 U.S.C. § 1028A(a)(1)

DANIEL RAUDONIS, and
LINDSEY RAUDONIS,

Defendants.

THE GRAND JURY CHARGES:

COUNTS 1-5

From on or about September 21, 2014, through on or about November 11, 2014,
in the Western District of Wisconsin, the defendant,

DANIEL RAUDONIS,

knowingly and willfully stole, embezzled, and converted to the use of another, things
of value belonging to the United States, namely, United States Department of
Agriculture food benefit funds, in the amounts listed below, with the intent to
deprive the owner of the use or benefit of the things of value:

COUNT	DATE	AMOUNT	INTENDED BENEFICIARY
1	09/21/2014	\$856.00	C.B.
2	10/08/2014	\$256.00	S.P.
3	11/07/2014	\$76.00	A.B.
4	11/10/2014	\$152.00	M.H.

5	11/11/2014	\$239.00	S.S.
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(All in violation of Title 18, United States Code, Section 641)

COUNT 6-10

From on or about September 21, 2014, through on or about November 11, 2014, in the Western District of Wisconsin, the defendant,

LINDSEY RAUDONIS,

knowingly and willfully received, concealed, and retained things of value of the United States, namely, United States Department of Agriculture food benefit funds, in the amounts listed below, knowing that the funds were embezzled, stolen, and converted and with the intent to convert said property to her own use:

COUNT	DATE	AMOUNT	INTENDED BENEFICIARY
6	9/21/2014	\$856.00	C.B.
7	10/08/2014	\$256.00	S.P.
8	11/09/2014	\$76.00	A.B.
9	11/11/2014	\$152.00	M.H.
10	11/11/2014	\$239.00	S.S.

(All in violation of Title 18, United States Code, Section 641)

COUNTS 11-13

From on or about September 21, 2014, through on or about November 7, 2014, in the Western District of Wisconsin, the defendant,

DANIEL RAUDONIS,

knowingly used, without lawful authority, a means of identification of another person, specifically the names, dates of birth, or Social Security numbers of real individuals, during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c) as alleged in Counts 1-5 above, knowing that the means of identification belonged to an actual person:

COUNT	DATE	NATURE OF IDENTITY THEFT
11	09/21/2014	Defendant activated a USDA food share benefit card intended to be delivered to C.B. by using C.B.'s date of birth and Social Security number (last four digits). Defendant used this information without C.B.'s permission.
12	10/08/2014	Defendant activated a USDA food share benefit card intended to be delivered to S.P. by using S.P.'s date of birth and Social Security number (last four digits). Defendant used this information without S.P.'s permission.
13	11/07/2014	Defendant activated a USDA food share benefit card intended to be delivered to A.B. by using A.B.'s date of birth and Social Security number (last four digits). Defendant used this information without A.B.'s permission.

(All in violation of Title 18, United States Code, Section 1028A(a)(1).)

COUNTS 14-16

From on or about September 21, 2014, through on or about November 9, 2014, in the Western District of Wisconsin, the defendant,

LINDSEY RAUDONIS,

knowingly used, without lawful authority, a means of identification of another person, specifically the names of real individuals, during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c) as alleged in Counts 6-10 above, knowing that the means of identification belonged to an actual person:

COUNT	DATE	NATURE OF IDENTITY THEFT
14	09/21/2014	Defendant used a USDA food share benefit card, which was intended for C.B. and displayed C.B.'s name. Defendant used this card without C.B.'s permission.
15	10/09/2014	Defendant used a USDA food share benefit card, which was intended for S.P. and displayed S.P.'s name. Defendant used this card without S.P.'s permission.
16	11/09/2014	Defendant used a USDA food share benefit card, which was intended for A.B. and displayed A.B.'s name. Defendant used this card without A.B.'s permission.

(All in violation of Title 18, United States Code, Section 1028A(a)(1).)

A TRUE BILL



PRESIDING JUROR

Indictment returned: 10/11/18



SCOTT C. BLADER
United States Attorney